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Attorneys for Defendant PNC Bank

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Coleman Family Revocable Living Trust, by and  
through Trustees Sahar Lewis and Pluyd Coleman,

Plaintiffs,

v.

PNC Bank, N.A., Matrix Trust Company, Clear  
Recon Corp., Stefanie Armijo, Does 1 through 20,

Defendants.

**CASE NO.:**

**(Removed from 8<sup>th</sup> Judicial District  
Court, State of Nevada  
Case No. A-25-916476-C)**

**PNC Bank's Notice of Removal**

**To all parties and their attorneys of record:**

Please take notice that PNC Bank, N.A. ("PNC Bank") by and through its counsel of record, Wolfe & Wyman LLP, remove this action to the United States District Court, District of Nevada.

1. This matter was commenced on April 9, 2025, when Plaintiffs filed a Complaint in the Eighth Judicial District Court of Nevada in and for the County of Clark, case no. A-25-916476-C. A true and correct copy of the Complaint is attached hereto as Exhibit A.

2. Upon information and belief, no defendant has been served and the consent of unserved defendants is, therefore, not required.

3. Upon information and belief, Plaintiff has not served any defendant with copies of the Complaint or Summonses.

4. This Notice of Removal is timely under 28 U.S.C. § 1332 because it is being filed within thirty days after service on the latest served defendant in the action.

1           5.       PNC Bank removes this case on the basis of diversity jurisdiction pursuant to 28  
2 U.S.C. § 1332. Diversity is satisfied as follows:

- 3           a.       Upon information and belief, Plaintiffs are Nevada residents;
- 4           b.       PNC Bank is a nationally chartered bank and citizen of Delaware pursuant to  
5 its articles of organization which designate Delaware as the place of its main  
6 office. Thus, PNC Bank is not a citizen of the State of Nevada. 28 U.S.C. §  
7 1348; *Wachovia Bank v Schmidt*, 546 U.S. 303, 306-307 (2006).
- 8           c.       On information and belief Defendant Clear Recon Corp. is a California entity  
9 with its main office in San Diego, California.
- 10          d.       On information and belief, Matrix Trust Company is a Colorado entity with its  
11 main office in Newark New Jersey.
- 12          e.       On information and belief Stefanie Armijo is a resident of California.
- 13          f.       Pursuant to 28 U.S.C. § 1332(a), the amount in controversy in this action  
14 exceeds the jurisdictional minimum because plaintiff seeks to void and revoke  
15 the deed of trust encumbering the subject property. The total amounts of the  
16 unpaid balanced of the obligations secured in that property plus reasonable  
17 estimated costs, expenses, and advances as of March 26, 2025, was  
18 \$274,218.20. Plaintiff's complaint also recites damages in the plainly  
19 exaggerated and overstated amount of \$180,000,000.

20          6.       Based on the above-referenced allegations, pursuant to 28 U.S.C. § 1441, et seq.,  
21 PNC Bank is entitled to remove this entire action from the Eighth Judicial District Court of Nevada  
22 to the United States District Court, District of Nevada, and PNC Bank so wishes to exercise that  
23 right.

24          7.       Pursuant to 28 U.S.C. § 1446(a), PNC Bank has attached all process, pleadings, and  
25 orders filed in the state court case, as follows:

- 26          a.       Complaint – Exhibit A
- 27          b.       Motion to Invoke Equity Jurisdiction, Enter Constructive Trust, and Accept  
28 Administrative Default – Exhibit B

- c. Motion for Order Shortening time to hear Emergency Motion for Temporary Restraining Order – Exhibit C
- d. Notice of Special Appearance by Trustees Sahar Lewis and Pluyd Coleman – Exhibit D
- e. Order Shortening Time to Hear Emergency Motion for Temporary Restraining Order – Exhibit E

8. Pursuant to 28 U.S.C. § 1441(c), a true copy of this removal has been filed or will be filed concurrently with the Eighth Judicial District Court of Nevada and served upon the Plaintiff.

9. PNC Bank reserves the right to supplement this Notice of Removal when additional information becomes available. Loancare further reserves all rights including, but not limited to, defenses and objections as to venue, personal jurisdiction and service. The filing of this Notice of Removal is subject to, and without waiver of any such defense or objection.

10. The undersigned signs this notice pursuant to Rule 11 of the Federal Rules of Civil Procedure. Plaintiff has not served any summons, complaint, or other documents to PNC, but all pleadings, filed in the state court case are included in the attached Exhibit A.

DATED: May 6, 2025

WOLFE & WYMAN LLP

By: /s/ DAVID T. BLAKE  
DAVID T. BLAKE, ESQ.  
Nevada Bar No. 11059